

**DYLAN J. TREVINO, A Minor, Suing
By His Next Friend and Guardian,
DIANA TREVINO, and DIANA
TREVINO, Individually,

Plaintiffs,**

V.

**BLITZ U.S.A., INC.; LAM 2011
HOLDINGS, LLC, f/k/a BLITZ
HOLDINGS, LLC; KINDERHOOK
CAPITAL FUND II, L.P.; BLITZ
ACQUISITION HOLDINGS, INC.;
BLITZ ACQUISITION, LLC; and
BLITZ RE HOLDINGS, LLC,**

Defendants.

Defendants.

On December 22, 2011, Defendant Kinderhook Capital Fund II, L.P. filed a Motion to Transfer Plaintiffs' veil piercing claim to the United States District Court for the District of Delaware pursuant to 28 U.S.C. § 1412 and 28 U.S.C. § 1404 or, in the alternative, to stay the claim pursuant to 11 U.S.C. § 362(a) and the Court's inherent power to manage its docket. On January 9, 2012, Plaintiffs filed an untimely Response to Defendant's Motion. Pursuant to Local Rule 7.01, Defendant seeks leave of Court to file the Reply Memorandum attached hereto as **Exhibit A**.

Dated: January 12, 2012

Respectfully submitted,

BASS, BERRY & SIMS PLC

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Attorneys for Defendant Kinderhook Capital Fund II, L.P.

CERTIFICATE OF SERVICE

I do hereby certify I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 12th day of January, 2012, which will send a notice of electronic filing to the following:

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